

COMMENT/RESPONSE DOCUMENT
SIP Revision for the Philadelphia Ozone Nonattainment Area
Reasonably Available Control Measure (RACM) Analysis
Proposed May 26, 2001

COMMENTATORS

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Numbers in parentheses after each comment refer to the commentator as listed above.

Comment #1: The commenter encourages the state to incorporate biodiesel fuel use into the SIP in order to reduce regulated and non-regulated emissions, including ozone-causing compounds. (3)

Response: The Department does encourage the voluntary use of biodiesel fuels as a means of emissions reduction and as a renewable fuel. For this revision, EPA asked specifically for clarifying information regarding the Commonwealth's consideration and analysis of Reasonably Available Control Measures (RACM). This revision clarifies the analysis performed by the Southeast Pennsylvania Ozone Stakeholders Group. While biodiesel remains a beneficial voluntary measure, it will not significantly advance the attainment date based on the reductions calculated for other alternative fuels in the stakeholder report and thus does not represent RACM.

Comment #2: The Department received various comments pertaining to subjects not directly relevant to this SIP revision which is limited to EPA's request for clarifying information on Reasonably Available Control Measures (RACM). These include:

- Opposition to Pennsylvania's use of de minimus emissions increases at Title V facilities, the five-year term of Title V permits, and the use of inter-pollutant emissions trading. (1)
- PA has failed to address reductions of criteria air emissions for major polluting industries across the state. (1)
- RACT for the control of NOx emissions will not be sufficient to enable states in the OTR to reach attainment. (1)
- Requesting that the emissions trading be eliminated in severe nonattainment areas. (1)
- Questioning DEP's February 2000 SIP revision calculations of mobile source inventory reductions for current and future years and questioned the same revision calculations for attainment of the 1-hour ozone standard in 2005. (2)

Response: This SIP revision is intended to clarify information regarding Reasonably Available Control Measures (RACM). While the Department appreciates these public comments, for the purposes of this SIP revision, the above comments are not relevant.